Students – Administrative Procedures

STUDENT RECORDS

Overview

All student records are confidential documents and will be maintained in an appropriate location under supervision. The individual building principals will establish procedures for the proper security, maintenance and control of student records currently used and will be guided by the legal responsibilities of the district and these administrative regulations.

I. Definition of Terms

Directory Information: This is information contained in an education record of a student which would not generally be considered harmful or an invasion of privacy if disclosed. It includes, but is not limited to:

- Student’s Name
- Student’s Address
- Student’s telephone listing
- Date and place of birth
- Major field of study
- Participation in officially recognized activities and sports
- Weight and height of members of athletic teams
- Student Photograph
- Dates of attendance
- Degrees and awards received

Disciplinary Action or Proceeding: This means the investigation, adjudication or imposition of sanctions by an educational agency or institution with respect to an infraction or violation of the internal rules of conduct applicable to students of the agency or institution.

Disclosure: Means to permit access to or the release, transfer or other communication of personally identifiable information contained in education records to any party by any means, including oral, written or electronic means.

Educational Agency or Institution: This means any public or private agency or institution.
**Education Records:** The term means those records that are directly related to a student; and maintained by an educational agency or institution or by a party acting for the agency or institution. The term does not include: Records of instructional, supervisory and administrative personnel and educational personnel ancillary thereto which:

A. are kept in the sole possession of the maker of the record, and  
B. are not accessible or revealed to any other person except a temporary substitute for the maker of the record.

**Eligible Student:** A student who has reached 18 years of age and/or is claimed on the parents' federal tax form as a dependent.

**Parent:** A parent of a student including natural parents, guardians or individuals acting as a parent in the absence of a parent or a guardian.

**Personally Identifiable Information:** Includes, but is not limited to:

A. Student's Name  
B. The names of the student's parent or other family members  
C. The address of the student or student's family  
D. A personal identifier, such as the student's social security number or student number  
E. A list of personal characteristics that would make the student's identity easily traceable.

**Record:** Means any information recorded in any way, including, but not limited to, handwriting, print, computer media, video or audiotape, film, microfilm and microfiche.

**Limited Term Records:** These are records which are destroyed when no longer applicable.

**Long Term Records:** These are records which are retained on a permanent basis.

**Authorized Personnel:** A person certified by the state and appointed by the Board of Education to a position as administrator, supervisor, teacher or special education staff worker, school nurse, clerical staff responsible for records, student teachers under the supervision of an authorized professional staff member, a person or professional service agency employed by the Adrian Board of Education to perform a function required in the conduct of the Board's educational program.

**CA-60:** This is the folder which contains the educational record of a student.
II. **Location of Student Records**

Student educational records are stored primarily in the student folder (CA-60) which is located in the school office of the school the student attends.

Working permit papers are retained in the attendance office at the senior high school.

Information on handicapped students is retained in the central registry which is maintained by the Lenawee Intermediate School District.

Upon entry into the senior high school or graduation from the Adrian Public Schools, the student’s folder (CA-60) containing long term records will be retained at the senior high school.

Student records for elementary and middle school students leaving the district prior to graduation will be retained for one year in the building last attended by the student and then forwarded to the Curriculum and Instruction office. The records will be maintained until the prospective year of graduation and as of June 30th of that year, only long-term information will be retained.

III. **Content of Student Records**

The student folder (CA-60) is composed of the following:

A. **Jacket:**
   - Front (to be updated annually by office or teacher according to building procedure).
   - Name and address of district
   - Date child enters school
   - Assigned Teacher (elementary only)
   - Withdrawal Date (if appropriate)
   - Grade last completed
   - Immunization completion stamp (top of left side-new entries only)
   - Inside – Tab data only (to be completed by teacher/records clerk)

B. **Inserts:**
   1. **Student Registration Form** – to be filled out by parent/guardian on initial entry into the Adrian Public Schools.
   2. **Health Appraisal Form** –
      a. **Part I Medical History** (required) – to be completed by parent/guardian.
      b. **Part II Immunization Record** (required) – to be completed by parent/guardian or attending physician. If Part II Immunization Data is incomplete, parent/guardian must complete and sign one of three statements indicated at the end of this section.
Content of Student Records – (Continued)

c. Part III Physical Examination (recommended) – to be completed by attending physician. Will be required if child participates in competitive athletics.

3. CA-60-A – Family Data and Tests – to be completed and/or updated annually during elementary and middle school years (in pencil).
   a. Child’s name, birth date and source indication.
   b. District wide standardized test scores where press scores are not available.
   c. All Michigan assessment testing returns labels and student individual reports.
   d. Additional building level diagnostic testing may be reported depending upon direction of the principal.
   e. Current home address and phone (make changes only when required and disregard grade column)
   f. Parents' surnames
   g. Appropriate family descriptors
   h. Siblings' names

4. CA-60 – Scholastic Data
   a. Elementary K-5
      Term ending information (grades)
      Grade Level
      Promoted (placed)
      Days Absent
      Signature of teacher (elementary only)
      Affix grade labels, if provided

   b. Secondary 6-12
      For students who are registered and/or withdraw from Adrian Public Schools, insert a copy of the students’ scholastic record (transcript) at the conclusion of each school year.

   i. Special honors may be noted according to building policy.
5. **Special Services Reports**
   a. **Remedial Reading Service Reports** – Stapled with most recent report on top (by remedial reading staff).
   b. **Speech and Language Therapy Reports** – Stapled with most recent report on top (by speech and language staff).
   c. **Special Education Individualized Educational Planning** – Committee (IEP) forms stapled together with most recent report on top.
   d. Reports from private clinics, agencies and special programs.

6. **Report Cards**
   a. **Elementary K-5**
      For students who have registered and/or withdrawn from Adrian Public Schools, a copy of the cumulative student report card will be inserted at the conclusion of each school year.

   b. **Secondary 6-12**
      For students who are registered and/or withdraw from Adrian Public Schools, insert a copy of the student's scholastic record (transcript) at the conclusion of each school year.

7. **Discipline Records**
   Behavior patterns or descriptions of incidents considered to be prejudicial to the child must be verifiable and documented to be placed in the record. These items must also have been reported in writing to the parents/guardians. Inferences, coincidental events and hearsay records may not be placed in the student's file.

IV. **Access to Student Records**

A. Authorized personnel will have access to a student's records when they have a legitimate educational interest in doing so. This need is determined by the person's need to:

   1. perform an administrative task required by the building administrator;
   2. perform a supervisory or instructional task directly related to the student's education;
   3. perform a service or benefit for the student or the student's family such as health care, counseling, student job placement or student financial aid.

B. Staff members having access to student records may not communicate or transfer the information so obtained to an unauthorized person without written consent of the parent/guardian or eligible student.
Access to Student Records (Continued)

C. Educational records may be disclosed to the United States Attorney General without prior parent/guardian or eligible student consent.

D. Access by Persons Other Than Authorized Personnel
Persons other than authorized personnel requesting access to a student's file must first obtain the written consent of the parent/guardian or eligible student. Upon presentation of such written consent to the building principal and completion of a request form, access to the file will be permitted. The signed request and the parent consent notice are to be retained in the file.

E. Distribution of Information from Student Records
No school employee shall disclose information or release records pertaining to student behavior in connection with any civil or criminal proceeding without the consent of the parent/guardian or the eligible student. Other student records may be produced where necessary to comply with a judicial order or lawfully issued subpoena or as otherwise required by law (includes action required in cases of suspected child abuse or neglect).

F. Parental Accessibility
Parents/guardians of students and eligible students may inspect and review the student's education records upon request. A professional staff member shall be present at the time of inspection to interpret the record.

A parent/guardian or eligible student desiring to inspect educational records should submit a written request to the student's school principal which identifies as precisely as possible the record or records he or she wishes to inspect. The principal shall comply with the request to review records as soon as practical, but under no circumstances longer than 45 days after the request is made. When circumstances do not permit a parent/guardian or eligible student to personally inspect an education record, the school district will, where possible, arrange for the parent/guardian or eligible student to obtain copies of the requested records. If records include information on more than one person, the parent(s)/guardian(s) have the right to inspect and review only their child's information or be informed of that information.

The parent's/guardian's right to inspect and review education records includes:

The right to request that the school provide copies of the records. Schools may charge a fee of 10 cents per page for copies of records provided.

Educational records shall not be destroyed or disposed of if there is an outstanding request to inspect, review or amend them.

Immediate access is given to parents/guardians requesting records for use at an Individualized Educational Planning Committee Meeting, a hearing or appeal.
Access to Student Records (Continued)

G. **Presumption of Authority**
Adrian Schools' personnel shall presume that the parent(s)/guardian(s) has (have) the authority to inspect and review records relating to their children unless otherwise advised by a court order that the parent(s)/guardian(s) does (do) not have the authority under applicable state law governing such matters as guardianship, separation, divorce, etc.

V. **Limited Term Records**
Limited term information shall be destroyed when no longer applicable. Records shall be inspected by the personnel of the building attended at the end of grade 12 so that limited term information without value shall be discarded. Limited term information necessary for school operation may include the following:

**Family and Residence:**
- Phone – Emergency Phone
- Siblings living in household
- Primary language in home

**Physical Health, Sensory and Related Conditions:**
- Inventory of physical measurements and conditions –
  - Height
  - Speech and Language
  - Weight
  - Teeth and Gums
  - Vision
  - Notable Physical Features
  - Hearing

**Medical History:**
- Diseases and Illnesses
- Medical laboratory test results
- Injuries
- Limitations
- Referrals of physical health, sensory and related conditions
- Immunization Record
- Surgery
- Emergency Information
Limited Term Records (Continued)

Performance:
- Transcript Request
- Interests and Plans
- Occupation and employment data
- Education and training information
- Honors Information
- Anecdotal Records

Proficiency Test Results and Psychological and Related Student Characteristics:
- Test Identification
- Scoring Information
- Referrals for social work or psychological evaluation

Enrollment:
- Dual enrollment information
- Special program modification

Special Assistance and Tuition Information:
- Remedial reading service report
- Speech and language services reports

VI. Long Term Records (Retained on a Permanent Basis)

Personal Identification:
- Name
- Resident/Address
- Student Number
- Sex
- Birth and Age Data
- Parent/Guardian’s Name

Enrollment:
- Entrance (admission) Information –
  - Date of entry or admission
  - School or other institution previously attended
- Educational level previously completed
- Attendance Information –
  - Withdrawal Information
  - Completion of School
Long Term Records (Continued)

School Performance Information:
- Credits (unit of value)
- Grades Received

Vocational Information:
- Educational Development Plan

Special Education Individualized Educational Program Plans
- All records pertaining to Identification, Evaluation and Placement of Students

Record of Participation in Driver's Education Program:
- Date of Completion

Record of Unauthorized Individuals who have Access to File with Parent/Guardian Permission

Records Excluded from Definition of Long Term Records:

A. Records of educational personnel that remain the sole possession of their maker and are not revealed to anyone except a temporary substitute.

B. Records of educational law enforcement units which are separately maintained, used only for law enforcement purposes and not disclosed to individuals other than law enforcement officials of the same jurisdiction.

C. Normal school business records relating to a person's capacity as an employee are not available for any other purpose. (Records of students employed by the school are educational records).

D. Records of adult students (18 years old and without legal guardian) which are created or maintained by a physician, psychiatrist, psychologist or other professional in connection with the provision of treatment to the student.
VII. Record of Access and Disclosure
The Adrian Public School District will maintain an accurate record of all requests it receives for the disclosure of information from or to permit access to, a student's education records and of information it discloses and access it permits, with some exceptions listed below. This record is to be part of the educational records of the student and will be maintained in the record custodian's student record file. It will be available only to the record custodian, an eligible student, the parent/guardian of a student or to federal, state or local officials for the purpose of auditing or enforcing federally supported educational records.

The record will include:

A. The name of the person or agency that made the request.
B. The interest of the person or agency had in the information.
C. The date the person or agency made the request.
D. Whether the request was granted or denied. If it was granted, the date access was permitted or the disclosure was made.

The district will maintain this record as long as it maintains the student's education record.

The record will not include:

A. Requests for access or access granted to parents/guardians of the student or to an eligible student.
B. Requests for access or access granted to officials of the Adrian Public School District who have a legitimate educational interest in the student.
C. Requests for or disclosures of information contained in the student's education records if the request is accompanied by the prior written consent of a parent/guardian of the student or by the eligible student or the disclosure is authorized by such prior consent or for requests for or disclosures of directory information designated for that student.

VIII. Procedures to Seek Amendment of Education Records
Parents/guardians of students and eligible students have a right to seek to change any part of the student's record they believe is inaccurate, misleading or in violation of a student's rights. When a parent/guardian of a student or an eligible student finds an item in the student's education records which he or she believes is inaccurate, misleading or in violation of student's rights, he or she may advise the record custodian of the error and ask that it be corrected. If the record is incorrect because of an obvious error, the record custodian may make the correction.
**Procedures to Seek Amendment of Education Records (Continued)**

If the custodian is unable to change the record to the requestor's satisfaction or the record does not appear to be obviously incorrect, the requester will be provided a copy of the questioned record at no cost and be advised of his/her right to request a hearing to challenge the content of the record. All such requests shall be submitted in writing directly to the Director of Curriculum, Instruction and Assessment.

The hearing officer, who will be designated by the Superintendent, will provide the requester a full and reasonable opportunity to present material evidence and testimony to demonstrate that the questioned part of the student's education record is incorrect.

Following the hearing, the hearing officer will prepare a written summary of the evidence submitted at the hearing, together with his or her recommendation, based solely on the evidence presented, that the record be changed or remain unchanged.

The Director of Curriculum, Instruction and Assessment will prepare the district's decision based on the summary of the evidence presented at the hearing and the hearing officer's recommendation. As a result of the district's decision, one of the following steps will be taken:

A. If the decision is that the district will change the record, the Director of Curriculum, Instruction and Assessment will instruct the record custodian to correct the record.

B. If the decision is that the district will not change the record, the Director of Curriculum, Instruction and Assessment will prepare a written notice to the requester that will include:
   1. The school district's decision that the record is correct and will not be changed.
   2. A copy of a summary of the evidence presented at the hearing and a written statement of the reasons for the district's decision.
   3. Inform the requester that he or she may place in the student's education records an explanatory statement which states the reasons he or she disagrees with the school district's decision and/or the reasons he or she believes the record is incorrect.

Whenever the Adrian Public School District receives an explanatory statement from a requester for attachment to a student's record, it will maintain that statement as part of the student's education records as long as it maintains the questioned part of the records. The statement will be attached to the questioned part of the records and whenever the questioned part of the records is disclosed, the explanatory statement will also be disclosed.

Upon attainment of age 18, the right of access and modification belong to the eligible student exclusively, not the parent/guardian.
IX. Research, Evaluation and Instructional Materials
All research, evaluation and instructional material, including personally identifiable data, teacher's manuals, films, tapes and other supplementary instructional material which will be used in connection with any research or evaluation program or project shall be available for inspection by the parents/guardians of the children engaged in such program or project. For the purpose of this section, "research or evaluation program or project" means any program or project in any applicable program designed to develop or access new or existing instructional objectives or methods.

No survey or data gathering concerning pupils shall be conducted unless approved by the Superintendent or designee. Information so collected shall be accorded the same security and privacy provisions as other student records.

Reports, evaluations and reviews of research projects shall not contain information that identifies particular students. This includes social security number or any data that would permit the personal identification of students. Federal, state and local educational administrators shall have access to summary records in connection with the audit of federal, state or district research projects.

X. Student Directory Information
According to the law, (Family Educational Rights and Privacy Act), the school district may publish directory information provided parents/guardians have had an opportunity to refuse permission to release any or all of the types of information designated. See definitions for a listing of Directory Information.

A. Release of Student Directory Information
If a parent/guardian or eligible student does not wish release of directory information or a portion thereof, pertaining to the student, including a student's photograph or image on film, written notification must be given to the building principal by September 1st of each school year specifying the types of directory information that are not to be disclosed with respect to the particular student.

The school district will annually inform the parents/guardians by September 1st of their right to have their child's directory information deleted from the distribution noted in this policy.

The district may disclose "directory information" on former students without student or parental/guardian consent.

B. Notification of Rights
On or before September 1st of each school year, school officials shall notify parents/guardians and eligible students of their rights under The Family Educational Rights and Privacy Act of 1974. This notice shall also be posted in each school building of the school district.
Notification of Rights (Continued)

The notice will advise parents/guardians and eligible students of the following:

1. The right of parents/guardians of a student and eligible students to inspect and review the student's educational records.
2. The intent of the school district to limit the disclosure of personally identifiable information contained in a student's education records except:
   a. where prior written consent of the student's parent/guardian or the eligible student is first obtained
   b. where the information has been designated "directory information", or
   c. under certain limited circumstances as permitted by law

C. The right of a student's parent/guardian or eligible student to seek to correct those parts of the student's education records which he or she believes to be inaccurate, misleading or in violation of the student's rights. This right includes the right to a hearing at which evidence may be presented that the record should be changed.

D. The fact that all rights and protections given parents/guardians under The Family Educational Rights and Privacy Act of 1974 and under this policy transfer to the student when he/she reaches eighteen (18) years of age or enrolls in a post-secondary school.


F. The procedure that a student's parent/guardian or an eligible student should follow to obtain copies of this policy and the locations where copies may be obtained.

XI. Transfer of Student Records

A. **Record Transfer Within District**
Forward the CA-60 to the receiving building.

**Receiving Building Should:**
- Review and update enrollment data form
- Indicate building change on CA-60 jacket (outside cover)

**Sending Building Should:**
- When moving to another building within Adrian Public Schools, forward all data including CA-60 jacket.
Transfer of Student Records (Continued)

B. **Record Transfer Outside District**
Student records may not be transferred to other educational institutions without the written consent of the parent/guardian of a student or the eligible student, to school officials of an educational institution which the student attends, seeks or intends to enroll, when such officials have a legitimate educational interest. Receiving school officials are to submit a written request that is to include the educational need for obtaining information from a student’s educational record. Such requests will be maintained on file.

Upon request, the parent/guardian of the student or an eligible student, will be provided with copies of the educational records that have been transferred at a cost not to exceed 10 cents per page.